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August 1, 2003

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Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

By Electronic Submission

Mr. John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Verizon Wireless Puerto Rico Phase II E911 Interim Report
CC Docket No. 94-102.

Dear Ms Dortch:

Enclosed please find the Verizon Wireless Puerto Rico Phase II E911 Interim Report due August 1, 2003.

Please feel free to contact me if you have any questions.

Sincerely,

/s/ Suzanne Yelen

Suzanne Yelen

Verizon Wireless Puerto Rico Phase II E911 Interim Report

This Interim Report is submitted by Verizon Wireless Puerto Rico ("VzWPR"), a Tier III carrier, to report its progress in implementing Enhanced 911 ("E911") service in compliance with the requirements established by the Commission.¹ Below is a description of VzWPR's network infrastructure implementation and handset implementation.

I. Network Infrastructure Implementation

VzWPR understands that it is required by September 1, 2003 or six months after the Public Service Answering Point ("PSAP") request is received, whichever is later, to:

- a) Install any hardware and/or software in the network as needed to enable the provision of Phase II Enhanced 911 service, and
- b) Begin delivering Phase II Enhanced service to the PSAP

At this time, there has been no request from the PSAP administrator for E911 service.

VzWPR currently is in the unique position of having two separate wireless networks in the same market in service, a CDMA network and a TDMA network. As explained below, because of technical issues, VzWPR will be pursuing a different technical solution to automatic location information (ALI) enable each network.

A. CDMA Network (1900 MHz band)

VzWPR has chosen a handset-based solution for its CDMA system and is in the process of selecting the supplier to ALI-enable this system. VzWPR issued a Request for Proposal and is currently evaluating the responses received from the following vendors:

- 1) TeleCommunication Systems (TCS)

¹ Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, CC Docket No. 94-102, *Order to Stay*, FCC 02-210 (rel. July 26, 2002).

- 2) Lucent Technologies
- 3) Hewlett-Packard
- 4) Telecommunication Services Inc. (TSI)

VzWPR's implementation plan for the CDMA network anticipates that a vendor will be chosen in mid-August and that it will take approximately 120 days to implement the necessary network changes. Thus, the CDMA network will be ALL-enabled in January 2004. Accordingly, VzWPR will be able to comply within the 6-month period after any PSAP administrator request for service.

B. TDMA Network (800 MHz band)

Because a handset-based solution is not technically feasible for the TDMA network, at this time, VzWPR has decided to implement a network-based solution. VzWPR issued a Request for Proposal and is currently evaluating the responses received from the following vendors: Grayson Wireless, True Position and Hewlett Packard. Once a vendor is selected, implementation is expected to take 180 days. Accordingly, VzWPR would be able to comply within the 6-month period after any PSAP administrator request for service, consistent with the vendor expectations.

II. Handset Implementation

Regardless of any PSAP request to enable the E911 deployment, VzWPR must:

- b) Begin selling and activating location-capable handsets no later than September 1, 2003;
- c) Ensure that at least 25 percent of all new handsets activated are location-capable no later than November 30, 2003;
- c) Ensure that at least 50 percent of all new handsets activated are location-capable no later than May 31, 2004;
- d) Ensure that at least 100 percent of all new handsets activated are location-capable no later than November 30, 2004.
- e) Ensure that penetration of location location-capable handsets among its subscribers reaches 95 percent no later than December 31, 2005.

To comply with these requirements, since May 2003, VzWPR has been selling and activating the following location-capable handsets for its CDMA system:

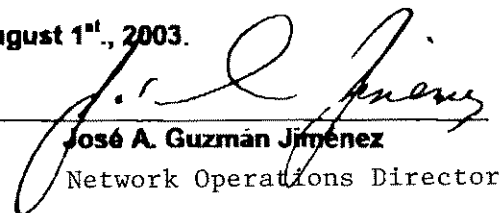
- 1) Nokia 3586
- 2) Audiovox 9150x
- 3) Audiovox 8300
- 4) Audiovox 8500
- 5) Audiovox 8600
- 6) Motorola T720

VzWPR is now depleting its pre-existing inventory of non-ALI compatible CDMA handsets. As of June 2003, more than 60% of VzWPR's new CDMA handsets shipped were ALI-compatible (using assisted GPS or aGPS) in compliance with the Commission's rules for this coming September and in line to allow VzWPR to exceed activations requirements for November of this year. VzWPR has a handset implementation plan in effect to monitor handset sales to assure that all implementation dates will be met, including the December 2005 deadline. Because a network-based solution will be implemented for the TDMA network, no handset upgrades or changes are necessary.

I, **José A. Guzmán Jiménez**, declare under penalty of perjury that the foregoing "Verizon Wireless Puerto Rico Phase II E911 Interim Report" is true and correct.

Executed on **August 1st, 2003.**

Signature: _____


José A. Guzmán Jiménez
Network Operations Director